

STATEMENT OF BASIS (AI No. 17771)

for draft Louisiana Pollutant Discharge Elimination System permit No. **LA0083674** to discharge to waters of the State of Louisiana.

THE APPLICANT IS: T. T. Barge Cleaning, Inc. Mile 183
19368 Highway 36
Covington, LA 70433

ISSUING OFFICE: Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313

PREPARED BY: Lisa Kemp

DATE PREPARED: December 24, 2008

1. PERMIT STATUS**A. Reason For Permit Action:**

Permit reissuance of an Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term.

B. NPDES permit – NPDES permit effective date: N/A
NPDES permit expiration date: N/A
EPA has not retained enforcement authority.

C. LPDES permits –
LPDES permit effective date: March 1, 2004
LPDES permit expiration date: February 28, 2009

D. Date Application Received: September 10, 2008; additional information received December 19, 2008 and December 23, 2008.

2. FACILITY INFORMATION**A. FACILITY TYPE/ACTIVITY - barge cleaning and repair facility**

This existing facility performs barge cleaning and repair operations. The ratio of barge repair to barge cleaning is 20:80. The types of vessels cleaned include tank barges that contained light petroleum oils and distillates, organic chemicals, inorganic chemicals, and vegetable-based products. Fuel tanks, slop tanks, and bilges from boats are also cleaned at the facility. All waters that come into contact with product residues are pumped to holding tanks on the dock barge, segregated, and stored. Hazardous washwaters are stored separately from non-hazardous washwaters. The water is then filtered while being transferred to the storage tanks on shore. Both hazardous and non-hazardous waters are transferred to tank trucks and removed offsite for proper disposition. Washwaters are not discharged from this facility. Recovered products are either returned to the owner of the product or are sold as recovered product.

The dock work area is curbed and stormwater falling within the curbed area is captured and disposed of off-site. Truck loading and transfer areas are concreted and curbed. Stormwater falling in this area is captured and disposed of off-site. All storage is in fixed roof tanks with

Statement of Basis for
 T. T. Barge Cleaning, Inc. Mile 183,
 LA0083674, AI No. 17771
 Page 2

secondary containment. Drummed materials are staged in a concreted, bermed area. Stormwater falling on tanks, loading areas, or in the secondary containment is disposed of off-site.

B. FEE RATE

1. Fee Rating Facility Type: minor
2. Complexity Type: II as per LAC33:IX.1319 Table I and SIC 4463. In Appendix A - Section IV (Relation of 1987 to 1977 Industries) of the Standard Industrial Classification Manual, the SIC code 4491 is equivalent to a previous SIC code of 4463
3. Wastewater Type: III
4. SIC code: 4491, 3731, 4499

C. LOCATION - 7324 LA Highway 405, Mississippi River (M.R.) Mile 183, in Modeste, Ascension Parish (Latitude 30° 10' 23", Longitude 91° 00' 55")

D. Drinking Water Supply – The nearest drinking water intakes are Peoples Water Service Company, Donaldsonville located at M.R. Mile 175.5 W and Bayou LaFourche Fresh Water District, Donaldsonville, located at M.R. Mile 175.5 W.

3. OUTFALL INFORMATION

Outfall 01A

Discharge Type: noncontact incoming ballast and void water from customer barges
 Treatment: none
 Location: at the point of discharge from the customer barge wing/void tanks
 (Latitude 30° 10' 22", Longitude 91° 00' 49")
 Flow: intermittent
 Discharge Route: the Mississippi River

Outfall 01B

Discharge Type: maintenance ballast water and void water
 Treatment: none
 Location: at the point of discharge from the work barge wing/void tanks
 (Latitude 30° 10' 22", Longitude 91° 00' 49")
 Flow: intermittent
 Discharge Route: the Mississippi River

Outfall 002

Discharge Type: boiler blowdown
 Treatment: pH adjustment
 Location: at the point of discharge from the blowdown line prior to combining with other waters (Latitude 30° 10' 24", Longitude 91° 00' 52")
 Flow: 300 gpd (maximum monthly average from DMRs)
 Discharge Route: by pipe to the Mississippi River

Statement of Basis for
 T. T. Barge Cleaning, Inc. Mile 183,
 LA0083674, AI No. 17771
 Page 3

Outfall 003

Discharge Type: treated sanitary wastewater
 Treatment: activated sludge STP with secondary chlorination
 Location: at the point of discharge from the STP prior to combining with other waters
 (Latitude 30° 10' 23", Longitude 91° 00' 51")
 Flow: 100 GPD
 Discharge Route: by pipe to the Mississippi River

Outfall 004

Discharge Type: dry dock ballast water
 Treatment: none
 Location: at the point of discharge from the dry dock
 (Latitude 30° 10' 26", Longitude 91° 00' 50")
 Flow: intermittent
 Discharge Route: the Mississippi River

4. RECEIVING WATERS

STREAM - the Mississippi River

BASIN AND SEGMENT - Mississippi River Basin, Segment 070301

DESIGNATED USES -
 a. primary contact recreation
 b. secondary contact recreation
 c. propagation of fish and wildlife
 d. drinking water supply

5. TMDL STATUS

The discharges from T. T. Barge Cleaning, Inc. Mile 183 are to the Mississippi River, Subsegment 070301 of the Mississippi River Basin. Subsegment 070301 is not listed on LDEQ's Final 2006 303(d) List as impaired, and to date no TMDL's have been established. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by any future TMDLs.

6. PROPOSED EFFLUENT LIMITS

BASIS - See Rationale, Page 7.

Changes from the previous permit:

Outfall 003

1. Monthly Average limitations have been included for BOD₅, TSS, and Fecal Coliform, and the Weekly Average Fecal Coliform limitation has been changed to Daily Maximum based on current LDEQ guidance for similar discharges.

Statement of Basis for
T. T. Barge Cleaning, Inc. Mile 183,
LA0083674, AI No. 17771
Page 4

Part II

1. Best Management Practices requirements for cleaning dry cargo barges have been removed from Part II of the draft permit because dry cargo barges are not cleaned at this facility.

7. COMPLIANCE HISTORY/COMMENTS

- A. OEC – There are no open, appealed, or pending OEC enforcement actions as of December 19, 2008.
- B. DMR Review/Excursions – DMRs on file for the period December, 2006 through December, 2008 were reviewed. The following excursions were noted:

Date	Parameter	Outfall	Reported Value	Permit Limits
Feb., 2008	Fecal Coliform	003	3900 col/100 ml	400 col/100ml
Jan., 2008	Fecal Coliform	003	1747 col/100 ml	400 col/100ml
	pH	003	5.99 s.u. (min.)	6.0 s.u. (min.)

- C. The most recent inspection was performed on February 4, 2005 and showed no areas of concern.

8. EXISTING EFFLUENT LIMITS

Outfall 01A: incoming ballast water from customer barges

Outfall 01B: maintenance ballast water

Pollutant	Limitation		Frequency
	Monthly Avg	Daily Max	
	mg/L		
Flow	Report	Report	1/week*
COD	---	250	1/week*
Oil & Grease	---	15	1/week*
pH, s.u.	6.0 (min)	9.0 (max)	1/week*

*The measurement frequency for Outfall 01B for the discharge of maintenance ballast water shall be 1/month whenever sampling is required. Sampling for Outfall 01B is only required when a visible sheen is present.

Outfall 002: boiler blowdown

Pollutant	Limitation		Frequency
	Monthly Avg	Daily Max	
	mg/L		
Flow	Report	Report	1/month
TRC*	---	0.2	1/month
pH, s.u.	6.0 (min)	9.0 (max)	1/month

* Limitation and monitoring for TRC is required only if a treatment is performed for this wastewater which consists of a chlorine or chlorine compound.

Statement of Basis for
T. T. Barge Cleaning, Inc. Mile 183,
LA0083674, AI No. 17771
Page 5

Outfall 003: treated sanitary wastewater

Pollutant	Limitation		Frequency
	Monthly Avg	Weekly Avg	
Flow	Report	Report	1/6 months
BOD ₅	---	45	1/6 months
TSS	---	45	1/6 months
Fecal Coliform colonies/100ml	---	400	1/6 months
pH, s.u.	6.0 (min)	9.0 (max)	1/6 months

Outfall 004: dry dock ballast water

Pollutant	Limitation		Frequency
	Monthly Avg	Daily Max	
Flow	Report	Report	1/month*
COD	---	250	1/month*
Oil & Grease	---	15	1/month*
pH, s.u.	6.0 (min)	9.0 (max)	1/month*

*Sampling is only required when a visible sheen is present.

s.u. – standard units

9. ENDANGERED SPECIES

The receiving waterbody, Subsegment 070301 of the Mississippi River Basin, has been identified by the U.S. Fish and Wildlife Service (FWS) as habitat for the Pallid Sturgeon, which is listed as an endangered species. LDEQ has not submitted this draft permit to the FWS for review in accordance with a letter dated November 17, 2008 from Rieck (FWS) to Nolan (LDEQ). As set forth in the Memorandum of Understanding between the LDEQ and the FWS, and based on information provided by the FWS, LDEQ has determined that the issuance of the LPDES permit is not likely to have an adverse effect upon the Pallid Sturgeon. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat. Therefore, the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat.

10. HISTORIC SITES

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

11. TENTATIVE DETERMINATION

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to issue a permit for the discharge described in the application.

Statement of Basis for
T. T. Barge Cleaning, Inc. Mile 183,
LA0083674, AI No. 17771
Page 6

12. PUBLIC NOTICES

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

Statement of Basis for
T. T. Barge Cleaning, Inc. Mile 183,
LA0083674, AI No. 17771
Page 7

Rationale for T. T. Barge Cleaning, Inc. Mile 183

1. **Outfall 01A:** noncontact incoming ballast and void water from customer barges

Pollutant	Limitation		Reference
	Monthly Avg.	Daily Max	
	mg/L		
Flow	Report	Report	
COD	---	250	Previous permit, Similar discharges (BPJ)
Oil & Grease	---	15	Previous permit, Similar discharges (BPJ)
pH, s.u.	6.0 (min)	9.0 (max)	Previous permit, Similar discharges (BPJ)

BPJ Best Professional Judgment

Treatment: none

Monitoring Frequency: Flow, COD, Oil & Grease and pH shall be observed once per week at the point of discharge from the customer barge/vessel wing/ void tanks.

Limits Justification: Limits and Monitoring Frequency are based on the previous permit and current guidance for similar discharges from other industrial facilities.

2. **Outfall 01B:** maintenance ballast water and void water
Outfall 004: dry dock ballast water

Pollutant	Limitation		Reference
	Monthly Avg	Daily Max	
	mg/L		
Flow	Report	Report	
COD	---	250	Previous permit, Similar discharges (BPJ)
Oil & Grease	---	15	Previous permit, Similar discharges (BPJ)
pH, s.u.	6.0 (min)	9.0 (max)	Previous permit, Similar discharges (BPJ)

BPJ Best Professional Judgment

Treatment: none

Monitoring Frequency: Flow, COD, Oil & Grease and pH shall be observed once per month whenever sampling is required.

Limits Justification: Limits and Monitoring Frequency are based on the previous permit and current guidance for similar discharges from other industrial facilities.

Statement of Basis for
T. T. Barge Cleaning, Inc. Mile 183,
LA0083674, AI No. 17771
Page 8

3. **Outfall 002: boiler blowdown**

Pollutant	Limitation		Reference
	Monthly Avg	Daily Max	
	mg/L		
Flow	Report	Report	BPJ; Previous permit, LAG480000, and similar discharges
TRC*	---	0.2	BPJ; Previous permit, LAG480000, and similar discharges
pH, s.u.	6.0 (min)	9.0 (max)	BPJ; Previous permit, LAG480000, and similar discharges

* Limitation and monitoring for TRC is required only if a treatment is performed for this wastewater which consists of a chlorine or chlorine compound.

BPJ Best Professional Judgment

Treatment: none

Monitoring Frequency: Flow, TRC*, and pH shall be monitored 1/month.

Limits Justification: Limits and Monitoring Frequency are BPJ, based on the previous permit, LPDES permit LAG480000, effective August 1, 2001, and current guidance for similar discharges from other industrial facilities.

4. **Outfall 003: treated sanitary wastewater**

Pollutant	Limitation		Reference
	Monthly Avg	Weekly Avg	
	mg/L		
Flow	Report	Report	BPJ; previous permit, LAG530000, and similar discharges
BOD ₅	30	45	BPJ; previous permit, LAG530000, and similar discharges
TSS	30	45	BPJ; previous permit, LAG530000, and similar discharges
Fecal Coliform colonies/100ml	200	400 (Daily Max)	BPJ; previous permit, LAG530000, and similar discharges
pH, s.u.	6.0 (min)	9.0 (max)	BPJ; previous permit, LAG530000, and similar discharges

Treatment: package treatment plant with secondary chlorination

Monitoring Frequency: Semiannually for all parameters at the point of discharge from the STP prior to mixing with waters of the state.

Limits Justification: BPJ; per the previous permit, the Class I Sanitary Discharge General Permit (LAG530000) - Schedule B, Treated Sanitary Wastewater less than 5000 GPD, and similar

Statement of Basis for
T. T. Barge Cleaning, Inc. Mile 183,
LA0083674, AI No. 17771
Page 9

discharges. Monthly Average limitations have been included for BOD₅, TSS, and Fecal Coliform and the maximum Fecal Coliform limitation has been changed from Weekly Average to Daily Maximum based on current LDEQ guidance for similar discharges.

This facility is not subject to Effluent Limitations Guidelines for Transportation Equipment Cleaning, 40 CFR Part 442, because, in accordance with 40 CFR 442.1.a, "this part applies to discharges resulting from cleaning the interior of tanks used to transport chemical, petroleum or food grade cargos." This facility does not discharge washwater from barge cleaning activities.

Storm Water Pollution Prevention Plan (SWP3) Requirement

A SWP3 is included in the permit because in accordance with LAC 33:IX.2511.A.1, storm water discharges shall not be required to obtain an LPDES permit "... except... discharges associated with industrial activity." In accordance with LAC 33:IX.2511.B.14.a-k, facilities classified as SIC code 4491, 4499, and 3731 are considered to have storm water discharges associated with industrial activity. In addition to the SWP3, the barge BMPs will be applied because barge BMPs are comparable to the SWP3 requirements.

For first time permit issuance, the SWP3 shall be prepared, implemented, and maintained within six (6) months of the effective date of the final permit. **For renewal permit issuance**, the SWP3 shall be reviewed and updated, if necessary, within six (6) months of the effective date of the final permit. The plan should identify potential sources of storm water pollution and ensure the implementation of practices to prevent and reduce pollutants in storm water discharges associated with industrial activity at the facility (see Part II of the permit).